

## **Exhibit B**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492  
Case No. 13-cv-09116

Judge John Z. Lee

**DECLARATION OF JOSEPH J. SIPRUT IN SUPPORT OF  
PETITION FOR FEES AND EXPENSES**

I, Joseph J. Siprut, declare as follows:

1. I am the Managing Partner with the firm of Siprut PC. I represent Plaintiffs and was court-appointed as Co-Lead Class Counsel (twice) in the above-entitled action, along with Steve Berman of Hagens Berman. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.

2. My firm and the Plaintiffs we represent support the Settlement in this matter.

3. My firm filed the first class action against the NCAA for concussions and head injuries back in September 2011. After Hagens Berman filed a separate case, later consolidated with my firm's case, Mr. Berman and I were appointed as Co-Lead Counsel. Since that time, our firms have acted as Co-Lead Counsel and jointly prosecuted this case – through discovery, through settlement, and leading up to today. From the inception of our work in this litigation, counsel for plaintiffs have aggressively prosecuted this case and vigorously represented the best interests of plaintiffs and the Class.

4. The work I and my firm have performed on behalf of the Class in this case includes significant pre-filing factual investigation on theories of liability against the NCAA and the analysis and development of those theories (given no such other case had ever been filed at

the time); significant screening and interviewing of potential class representative candidates, and the factual investigation necessary for that process; post-filing, and in tandem with Hagens Berman, handling and coordinating the massive written and oral discovery in this case; motion practice; briefing and research on class certification; continued communication with Class representatives and Class members; attending multiple mediations and settlement conferences over the course of months; and presenting and, over the course of many months, defending the class action settlement in this case.

5. Through January 11, 2017, the total number of hours spent on this litigation by my firm is 4714.5. The total lodestar amount for attorney/professional time based on the firm's current rates is \$2,666,713. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. (If an associate attorney who billed time on the case subsequently left the firm, the rates utilized for that individual below are the rates currently charged by the firm for associates of that rank or seniority.) A breakdown of the lodestar is as follows:

<b>NAME</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>
Gregg Barbakoff, Associate	470	\$375	\$176,250
James McClintock, Associate	436	\$375	\$163,500
Todd McLawhorn, Partner	20.5	\$625	\$12,812.50
Richard Miller, Partner	13	\$550	\$7,150
Joseph Siprut, Partner	2,584	\$750	\$1,938,000
Aleksandra Vold, Associate	846	\$375	\$317,250
Kristina Pearson, Paralegal	345	\$150	\$51,750
<b>TOTAL:</b>	<b>4714.5</b>		<b>\$2,666,713</b>

6. My firm incurred a total of \$26,476.76 in expenses in connection with the prosecution of this litigation. They are itemized as follows:

09/12/11	ND IL filing fee	\$350.00	
09/30/11	Arrow - Siprut to Dirksen Federal Building	\$6.90	
	Pacer document lookup and retrieval -		
10/01/11	September 2011	\$12.56	
10/01/11	Courtlink usage - September 2011	\$13.96	

10/08/11	Elsevier - online access to article	\$31.50
10/10/11	It's Your Serve - Rush service to NCAA	\$185.00
10/10/11	It's Your Serve - Rush service to NCAA Football - Duke Univ	\$185.00
11/01/11	Pacer document lookup and retrieval - October 2011	\$7.84
11/01/11	Courtlink usage - October 2011	\$21.68
12/01/11	Courtlink usage - November 2011	\$13.88
01/01/12	WestLaw usage - Dec. 2011	\$132.35
01/01/12	Courtlink usage - Dec 2011	\$14.18
01/11/12	FedEx Office - Binding for Motion	\$4.70
01/31/12	Court Reporter for Proceedings	\$59.15
02/01/12	WestLaw usage - January 2012	\$13.82
02/01/12	Courtlink usage - Jan 2012	\$2.91
02/01/12	Arrow - Siprut PC to Dirksen Federal Building	\$6.00
03/01/12	Courtlink usage - Feb 2012	\$9.22
04/01/12	Courtlink usage - March 2012	\$2.78
04/01/12	Westlaw usage - March 2012	\$5.66
04/01/12	Pacer document retrieval - March 2012	\$0.56
05/01/12	Courtlink usage - April 2012	\$0.46
06/01/12	WestLaw usage - May 2012	\$2.24
06/01/12	Courtlink usage - May 2012	\$0.30
07/01/12	Courtlink usage - June 2012	\$0.38
07/13/12	Pacer document lookup and retrieval - Vold 2ndQ '12	\$12.16
07/27/12	University of Arkansas - Palacios transcript	\$5.00
08/01/12	Courtlink usage - July 2012	\$0.53
09/01/12	WestLaw usage - August 2012	\$3.37
09/20/12	Arrow - Siprut PC to Greenburg Traurig	\$13.80
10/01/12	Pacer usage - September 2012	\$0.20
10/17/12	Robert Half International -Subcontracted Legal Services	\$943.23
10/22/12	Robert Half International -Subcontracted Legal Services	\$1,634.00
11/01/12	St. Joseph Medical Center - Release of Information	\$25.28
11/01/12	Robert Half International -Subcontracted Legal Services	\$1,634.00
11/07/12	Robert Half International -Subcontracted Legal Services	\$1,634.00
11/13/12	Robert Half International -Subcontracted Legal Services	\$1,634.00
11/16/12	FedEx - Siprut PC to University of Arkansas	\$14.65
11/21/12	Robert Half International -Subcontracted Legal	\$1,634.00

	Services	
12/01/12	Courtlink - November 2012	\$0.17
12/17/12	Amtrack - train ticket for Arrington for meeting	\$64.00
12/18/12	Potbelly - Lunch for client meeting	\$65.52
01/01/13	Courtlink usage - December 2012	\$0.22
01/11/13	UCCO- Hotel/Food charges for Arrington during press stay	\$200.56
02/25/13	OSF Saint Francis Medical Center - Arrington records	\$140.44
02/27/13	Amtrack - train ticket for Arrington for meeting	\$83.00
02/28/13	UCCO- Hotel/Food charges for Arrington during ESPN stay	\$270.11
02/28/13	Food for ESPN press day - Breakfast	\$164.30
02/28/13	Food for ESPN press day - Lunch	\$119.60
02/28/13	AMSV - Expense reimbursement for transportation	\$7.02
03/01/13	Courtlink usage - February 2013	\$6.52
03/07/13	University of Arkansas - Palacios transcript	\$10.00
03/13/13	AMSV - Expense reimbursement for transportation	\$7.26
03/14/13	Food for Deposition of A. Arrington - Lunch	\$127.67
03/14/13	AMSV - Expense reimbursement for transportation	\$6.78
03/14/13	AMSV - Expense reimbursement for food - dinner	\$14.35
03/21/13	OSF Saint Francis Medical Center - Arrington records	\$34.36
03/28/13	Veritext Chicago Reporting - Transcript 3/14/13	\$767.80
04/01/13	WestLaw usage - March 2013	\$5.37
04/08/13	AMSV - Misc. food and travel expenses	\$133.81
04/09/13	AMSV - Misc. food and travel expenses	\$85.31
04/17/13	Veritext Chicago Reporting - Transcript 3/14/13	\$545.35
05/01/13	WestLaw usage - April 2013	\$21.97
05/01/13	Courtlink usage - April 2013	\$11.58
05/28/13	HealthPort - Medical records for Arrington	\$29.76
06/01/13	WestLaw usage - May 2013	\$39.63
06/01/13	Courtlink usage - May 2013	\$0.31
07/01/13	Courtlink usage - June 2013	\$23.43
08/06/13	UCCO- Hotel/Food charges for Arrington during dep	\$822.82
09/01/13	Courtlink usage - August 2013	\$0.25
9/13/13	Kristi Grgeta - PR Services	\$1,000.00
1-2/13-	UCCO- Hotel/Food charges for Arrington during	\$1,071.74

10/4/13	media stay	
10/01/13	Courtlink usage - September 2013	\$3.28
10/03/13	Food for Media interview	\$129.90
10/03/13	LW - Expense reimbursement for A. Arrington	\$50.00
10/22/13	JJS - Travel Expenses for Mediation 11/1/13	2224.39
	JJS - Misc. travel expenses for Mediation	
11/1/13	11/1/13	85.53
11/01/13	Courtlink usage - October 2013	\$1.19
12/01/13	Courtlink usage - November 2013	\$1.77
12/4-		
12/7/13	JJS - Travel Expenses hotel for MDL	\$1,048.32
12/04/13	JJS Travel car for MDL	\$177.00
12/07/13	JJS Travel flight for MDL	\$382.90
12/07/13	JJS Travel car for MDL	\$177.00
12/07/13	JJS Travel misc. expenses for MDL	\$250.00
12/12/13	JJS Travel for mediation - airfare and hotel	\$1,414.43
12/12/13	JJS Travel for mediation - car services	\$550.00
12/12/13	JJS Travel for mediation - misc. expenses	\$85.74
01/01/14	Pacer usage - December 2013	\$2.70
01/01/14	Courtlink usage - December 2013	\$10.63
02/01/14	Courtlink usage - January 2014	\$1.81
02/05/14	JJS Travel car for mediation	\$177.00
2/5-2/7/14	JJS Travel airfare for mediation	\$645.00
2/5-2/7/14	JJS Travel hotel for mediation	\$1,147.02
02/07/14	JJS Travel car for mediation	\$177.00
02/07/14	JJS Travel misc. expenses for mediation	\$539.80
03/01/14	Pacer usage - February 2014	\$2.10
03/01/14	WestLaw usage - February 2014	\$207.11
	Admin overtime hours - LW open office early	
04/23/14	for film crew	\$30.00
06/01/14	Pacer usage - May 2014	\$5.10
	Spending money for A. Arrington for	
07/24/14	Bloomington trip	\$40.00
	Expense reimbursement: LW Cash for A.	
07/24/14	Arrington (CNN interview)	\$40.00
07/31/14	Alexandra Roth - Transcript fee	\$98.70
	Expense reimbursement: LW Cash for A.	
07/31/14	Arrington (Fox & Friends interview)	\$40.00
	UCCO- Hotel/Food charges for Arrington during	
08/10/14	media stay	\$2,242.17
08/19/14	U.S. Messenger - Siprut PC to Dirksen Federal	\$6.06
10/01/14	Pacer Usage - September 2014	\$11.40

12/01/14	Pacer Usage - November 2014	\$2.30
03/01/14	Courtlink usage - February 2014	\$28.72
04/01/14	Courtlink usage - March 2014	\$1.05
05/01/14	Courtlink Usage - April 2014	\$1.45
04/01/14	Courtlink Usage - May 2014	\$2.83
07/01/14	Courtlink Usage - June 2014	\$2.43
08/01/14	Courtlink Usage - July 2014	\$4.78
09/01/14	Courtlink Usage - August 2014	\$24.28
10/01/14	Courtlink Usage - September 2014	\$13.58
11/01/14	Courtlink Usage - October 2014	\$8.75
12/01/14	Courtlink Usage - November 2014	\$5.59
01/01/15	Courtlink Usage - December 2014	\$4.49
02/01/15	Courtlink Usage - January 2015	\$5.56
02/01/15	Pacer Usage - January 2015	\$0.20
03/01/15	Pacer Usage - February 2015	\$18.10
03/01/15	Courtlink Usage - February 2015	\$6.64
04/01/15	Courtlink Usage - March 2015	\$10.58
05/01/15	Courtlink Usage - April 2015	\$19.10
06/01/15	Pacer Usage - May 2015	\$2.20
06/01/15	Courtlink Usage - May 2015	\$9.62
07/01/15	Courtlink Usage - June 2015	\$11.73
07/01/15	Pacer Usage - June 2015	\$13.10
07/01/15	Westlaw Usage - June 2015	\$1.84
08/01/15	Pacer Usage - July 2015	\$3.00
08/01/15	Courtlink Usage - July 2015	\$9.94
08/19/15	US District Court for ND Ill. - Transcript of proceedings for motion hearing (8/18/15)	\$13.20
09/01/15	Pacer Usage - August 2015	\$3.40
09/01/15	Courtlink Usage - August 2015	\$31.69
10/01/15	Pacer Usage - September 2015	\$4.70
10/01/15	Courtlink Usage - September 2015	\$6.70
11/01/15	Courtlink Usage - October 2015	\$5.09
12/01/15	Pacer Usage - November 2015	\$4.10
12/01/15	Courtlink Usage - November 2015	\$11.10
01/01/16	Courtlink Usage - December 2015	\$6.62
02/01/16	Courtlink Usage - January 2016	\$10.84
03/01/16	Courtlink Usage - February 2016	\$11.17
04/01/16	Courtlink Usage - March 2016	\$13.97
04/05/16	Expense reimbursement: MS Uber ride to and from home for hearing	\$32.46

05/01/16	Courtlink Usage - April 2016	\$9.64
06/01/16	Courtlink Usage - May 2016	\$31.00
07/01/16	Courtlink Usage - June 2016	\$3.93
08/01/16	Pacer Usage - July 2016	\$0.10
08/01/16	Courtlink Usage - July 2016	\$18.45
09/01/16	Courtlink Usage - August 2016	\$16.11
09/01/16	Pacer Usage - August 2016	\$0.30
10/01/16	Courtlink Usage - September 2016	\$49.13
11/01/16	Courtlink Usage - October 2016	\$133.81

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records, and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of January, 2017

*/s/ Joseph J. Siprut*

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Joseph J. Siprut